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8 Proposed Attorneys for Debtor

9 UNITED STATES BANKRUPTCY COURT  
10 FOR THE DISTRICT OF NEVADA

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12 IN RE: Case No. 18-51144-btb  
13 (Chapter 11)  
14 COPPER CANYON PARTNERS LLC,

15 Debtor.

16 **DECLARATION OF PHILLIP KIRK**  
17 **DeLaMARE IN SUPPORT OF**  
18 **EMERGENCY MOTION FOR ORDER**  
19 **AUTHORIZING MAINTENANCE OF**  
20 **PREPETITION BANK ACCOUNT**

21 Hearing Date: OST Pending  
22 Hearing Time: OST Pending  
23 Est. Time: 10 minutes  
24 Set by: Judge Beesley

25 I, Phillip Kirk DeLaMare, hereby declare as follows:

26 1. I am over the age of 18 and am mentally competent. Except as otherwise  
27 indicated, all facts set forth in this Declaration are based upon my personal knowledge of the  
28 Debtor, information learned from my review of relevant documents and information supplied to  
me by other members of Debtor's management and various business and legal advisors.

2. I am the duly appointed representative of DeLaMare Family Investments No. 1,  
L.P., a Managing Member of the Debtor.


1           3.       I have read the EMERGENCY MOTION FOR ORDER AUTHORIZING  
2 MAINTENANCE OF PREPETITION BANK ACCOUNT ("Motion") and attest that the contents  
3 therein, including exhibits, are true and correct to the best of my knowledge, information and  
4 belief.

5           4.       As can be seen from the Exhibit "A" to the Motion, the Debtor seeks to maintain  
6 its prepetition Bank Account, as it would be burdensome and disruptive to the Debtor's ongoing  
7 business operations to close this account and open a new Debtor-in-Possession account. As the  
8 representative of the Debtor, I believe in my best business judgment that it is in the best interest  
9 of the estate and creditors to maintain the Bank Account as it existed prepetition.

10          5.       In order to avoid possible harm to the continuing business operations of the Debtor,  
11 it is imperative that the Debtor have a seamless continued use of its existing pre-petition Bank  
12 Accounts. Interruption in the payment and honoring of Credits and Debits could be detrimental  
13 to the Debtor's Chapter 11 reorganization process if the Debtor does not have immediate access  
14 to its Bank Account to pay post-petition operating expenses and debt service.

15           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
16 knowledge and belief.

17           Dated this 12<sup>th</sup> day of October, 2018.

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20 Phillip Kirk DeLaMare, representative of  
21 DeLaMare Family Investments No. 1, L.P.,  
22 Managing Member  
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